## REMARKS

This Application has been carefully reviewed in light of the Office Action mailed June 27, 2005. Claims 1-6, 8-16, 18-26 and 28-30 were pending in the Application. In the Office Action, Claims 1-6, 8-16, 18-26 and 28-30 were rejected. In order to expedite and advance prosecution of this Application, Applicant amends Claims 1, 12, 19 and 22. Thus, Claims 1-6, 8-16, 18-26 and 28-30 remain pending in the Application. Applicant respectfully requests reconsideration and favorable action in this case.

As a preliminary matter, Applicant has amended Claim 19 to depend from Claim 18 instead of Claim 12. The dependency amendment to Claim 19 was not made to overcome any cited reference or in response to any present rejection of Claim 19.

In the Office Action, the following actions were taken or matters were raised:

## SECTION 102 REJECTIONS

Claims 1-6, 8-16, 18-26 and 28-30 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,427,161 issued to LiVecchi (hereinafter "*LiVecchi*"). Applicant respectfully traverses this rejection.

Of the rejected claims, Claim 1, 12 and 22 are independent. Applicant respectfully submits that *LiVecchi* does not disclose or even suggest each and every limitation of amended Claims 1, 12 and 22. For example, independent Claim 1, as amended, recites, "receiving a service request from a client by the socket accept thread," "transferring the request to a data structure," "retrieving the request, by the control thread, from the data structure," and "transferring the request to a client thread dynamically created by the control thread to process request data associated with the request" (emphasis added) (support for the amendment to Claim 1 found at least at page 5, lines 6-9, page 6, lines 18-27, and elsewhere in Applicants' specification). *LiVecchi* appears to disclose a multithreaded server process having a plurality of worker threads for processing data requests (*LiVecchi*, column 11, lines 1-26, 55-67, column 12, lines 1-35). *LiVecchi* also appears to disclose that in the *LiVecchi* system, there are two groups of worker threads: 1) active threads; and 2) blocked threads

(comprised of worker threads not in the first group) (*LiVecchi*, column 7, lines 20-42). *LiVecchi* also appears to disclose a scheduling heuristic to determine whether to unblock a waiting existing thread to process a data request or wait for a currently-running thread to complete (*LiVecchi*, column 12, line 66 to column 13, line 2). Thus, in *LiVecchi*, there appears to be a finite number of "worker threads" for processing a data request. In contrast, Applicant's invention as recited by Claim 1 dynamically creates client threads to process the requests. Accordingly, *LiVecchi* does not appear to disclose or even suggest "transferring the request to a client thread dynamically created by the control thread to process request data associated with the request" as recited by amended independent Claim 1 (emphasis added). Therefore, for at least this reason, Applicant submits that *LiVecchi* does not anticipate amended independent Claim 1.

Independent Claim 12, as amended, recites a server process operable to "receive a service request from a client by the socket accept thread," "transfer the request to a data structure," "retrieve the request, by the control thread, from the data structure," and "transfer the request to a client thread dynamically created by the control thread to process request data associated with the request" (emphasis added), and independent Claim 22, as amended, recites application software operable to "receive a request from a client by the socket accept thread," "transfer the request to a data structure," "retrieve the request, by the control thread, from the data structure," and "transfer the request to a client thread dynamically created by the control thread to process request data associated with the request" (emphasis added). At least for the reasons discussed above in connection with independent Claim 1, Applicant respectfully submits that *LiVecchi* does not anticipate independent Claims 12 and 22 as amended.
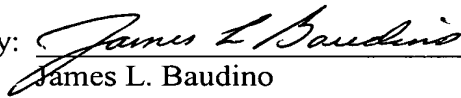
Claims 2-6, 8-11, 13-16, 18-21, 23-26 and 28-30 that depend respectively from independent Claims 1, 12 and 22 are also not anticipated by *LiVecchi* at least because they incorporate the limitations of respective Claims 1, 12 and 22 and, also, they add additional elements that further distinguish *LiVecchi*. Therefore, Applicants respectfully request that the rejection of Claims 2-6, 8-11, 13-16, 18-21, 23-26 and 28-30 be withdrawn.

## CONCLUSION

Applicant has made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

An RCE filing fee of $790.00 is believed due. The Director of Patents and Trademarks is hereby authorized to charge Deposit Account No. 08-2025 of Hewlett-Packard Company the amount of $790.00 to satisfy the RCE filing fee. If, however, Applicant has miscalculated the fee due with this RCE, the Director is hereby authorized to charge any fees or credit any overpayment associated with this RCE to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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